

Meeting w/PSNH  
12/12/06

## HB 1673

- Recognized suspect nature of 2003 stack test data
- Acknowledged the need for current and accurate mercury data
- Required calculation of baseline using current stack test results and current fuel data
- Realized and addressed the numerous emissions reduction tests and trials that would be on-going at Merrimack Station (i.e. DOE testing, NHCPA coal blend testing), all of which require the units to burn non-traditional fuels.
- Confirmed that baseline should be calculated using traditional fuels, excluding trial or test coals

## Requirements to Obtain Current and Accurate Mercury Data

### Stack Testing Requirements


- Conduct 4 tests (at a minimum) on MK1, MK2, and SR4 (or SR6)
- Emissions reduction tests/trials will be interrupted to complete required stack tests
- Use best available / most appropriate stack test method
- Produce current and accurate data
- Confirm data repeatability

### Fuel Sampling Requirements

- 12 month sampling program
- Representative monthly sample of coal used traditionally, not to include trial or test coal blends
- At least 4 samples shall correspond with stack tests conducted
- Provides current coal data to avoid relying on 2002-2003 data for use with 2006 stack test data

## IMPLEMENTATION

### Stack Testing Options

1. Ontario Hydro Method
  - Provides speciated data
  - Conducted previously at MK and SR
  - More complicated and expensive than other test methods
  - Accuracy suspect
2. Sorbent Trap Method (i.e., Appendix K, Method 324)
  - Recommended for use in calculating baseline emissions by ADA-ES
  - Conducted previously at MK and SR
  - Widely used and accepted for use by utilities
  - Less complicated and less expensive than OHM
3. Method 29 
  - Established method for use by MWCs
  - Limited use by utilities
  - Less complicated and less expensive than OHM
  - More expensive and complicated than Sorbent Trap Method

### Fuel Sampling Options

1. Fuel Shipment Sampling Analysis
  - Consistent with analysis conducted to satisfy fuel sampling program requirements contained in HB 284
  - Most extensive, accurate, and consistent
  - Conducted using required ASTM methods
  - Analytical procedures audited
  - Commercial accuracy maintained
  - Eliminates data gaps
  - Significant amount of historical data exists for comparison and validation
2. On-Site Fuel Sampling Analysis
  - Creates data gaps when test blends and trials are on-going
  - Representative sample cannot be substantiated
  - Limited ability to conduct comparison and validation of data
  - Would require interruption of trial and test programs, resulting in increased emissions and decreased evaluation of potential fuels for future use